

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SINGULAR COMPUTING LLC,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

C.A. No. 1:21-cv-12110-FDS

**DEFENDANT GOOGLE LLC’S UNOPPOSED MOTION FOR LEAVE
TO FILE A REPLY BRIEF IN SUPPORT OF ITS MOTION TO STAY**

Defendant Google LLC (“Google”) hereby moves for leave to file a reply brief in support of its motion for a stay. Dkt. No. 12. If granted, Google would file its reply brief no later than March 21, 2022 and the brief would be no longer than ten pages in length.

As grounds, Google states as follows:

1. On February 11, 2022, Google filed a motion to stay the above-captioned litigation pending final written decisions from the PTAB addressing the patents asserted in a related litigation, *Singular Computing LLC v. Google LLC*, 1:19-cv-12551-FDS (“*Singular I*”). Dkt. No. 12. Those final written decisions are due to issue no later than May 14, 2022.

2. On March 11, 2022, Plaintiff Singular Computing LLC (“Singular”) filed a response to Google’s motion to stay. Dkt. No. 46. Singular’s response raises a number of arguments regarding whether a stay of this case is appropriate.

3. Google’s proposed 10-page reply seeks to respond in a succinct manner to the issues Singular raised in its response. Google respectfully submits that the proposed reply will assist the Court in resolving the pending motion to stay.

4. Counsel for Singular has indicated that Singular does not oppose Google's request for leave to file a reply brief.

WHEREFORE, Google respectfully requests that the Court GRANT this Motion and provide Google leave to file no later than **March 21, 2022** a ten-page reply brief in support of its motion to stay.

Date: March 14, 2022

Respectfully submitted,

/s/ Nathan R. Speed

Gregory F. Corbett (BBO #646394)
gcorbett@wolfgreenfield.com
Nathan R. Speed (BBO # 670249)
nspeed@wolfgreenfield.com
Anant K. Saraswat (BBO #676048)
asaraswat@wolfgreenfield.com
Elizabeth A. DiMarco (BBO #681921)
edimarco@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Fax: (617) 646-8646

Robert Van Nest*
rvannest@keker.com
Michelle Ybarra*
mybarra@keker.com
Eugene M. Paige*
epaige@keker.com
Andrew Bruns*
abrunns@keker.com
Vishesh Narayen*
vnarayen@keker.com
Anna Porto*
aporto@keker.com
Deeva Shah*
dshah@keker.com
Stephanie J. Goldberg*
sgoldberg@keker.com
KEKER, VAN NEST & PETERS LLP
633 Battery Street

San Francisco, CA 94111-1809
(415) 391-5400

Michael S. Kwun*
mkwun@kblfirm.com
Asim Bhansali*
abhansali@kblfirm.com
KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750
San Francisco, CA 94111
(415) 630-2350

Matthias A. Kamber*
mattiaskamber@paulhastings.com
PAUL HASTINGS, LLP
101 California Street
Forty-Eighth Floor
San Francisco, CA 94111
Phone: (415) 856-7050
Fax: (415) 856-7150

Counsel for Defendant Google LLC
**motions for pro hac vice filed*

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Nathan R. Speed, counsel for Defendant Google LLC, hereby certify that we have conferred with counsel for Plaintiff Singular Computing LLC to resolve or narrow the issues presented in this motion. Counsel for Plaintiff indicated that Plaintiff did not oppose this motion.

Date: March 14, 2022

/s/ Nathan R. Speed

Nathan R. Speed

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

Date: March 14, 2022

/s/ Nathan R. Speed

Nathan R. Speed